

EXHIBIT G

**BRIAN WHITE
GIBSON V GOLDSTON**

March 01, 2022

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<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT FOR THE</p> <p>2 SOUTHERN DISTRICT OF WEST VIRGINIA</p> <p>3 AT BECKLEY</p> <p>4 *****</p> <p>5 MATTHEW GIBSON,</p> <p>6 Plaintiff,</p> <p>7 vs.</p> <p>8 CIVIL ACTION NO. 5:21-cv-00181</p> <p>9 LOUISE E. GOLDSTON, Individually,</p> <p>10 COUNTY COMMISSION OF RALEIGH</p> <p>11 COUNTY, a political subdivision,</p> <p>12 JEFF MCPENAKE, Individually,</p> <p>13 BRIAN WHITE, Individually,</p> <p>14 BOBBY STUMP, Individually,</p> <p>15 KYLE LUSK, Individually,</p> <p>16 Defendant.</p> <p>17 *****</p> <p>18 Deposition of BRIAN WHITE taken by the</p> <p>19 Plaintiff under the Federal Rules of Civil</p> <p>20 Procedure in the above-entitled action, pursuant to</p> <p>21 notice, before Bradford L. Cooper, a Notary Public,</p> <p>22 at Pullin, Fowler, Flanagan, Brown, and Poe, PLLC,</p> <p>23 252 George Street, Beckley, West Virginia, on the</p> <p>24 1st day of March, 2022.</p> <p>REALTIME REPORTERS, a Huseby Company BRADFORD L. (Brad) COOPER, Notary Public 713 Lee Street Charleston, WV 25301 (304) 344-8463 realtimereporters.net</p>	<p style="text-align: right;">Page 3</p> <p>1 EXAMINATION INDEX</p> <p>2</p> <p>3 BY MR. BRYAN 5</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 APPEARING FOR THE PLAINTIFF:</p> <p>3 John H. Bryan, Esquire</p> <p>4 JOHN H. BRYAN, ATTORNEYS AT LAW</p> <p>5 411 Main Street</p> <p>6 P.O. Box 366</p> <p>7 Union, West Virginia 24983</p> <p>8 jhb@johnbryanlaw.com</p> <p>9 APPEARING FOR THE DEFENDANTS STUMP, MCPENAKE, AND</p> <p>10 WHITE:</p> <p>11 Kevin J. Robinson, Esquire</p> <p>12 PULLIN, FOWLER, FLANAGAN, BROWN,</p> <p>13 AND POE, PLLC</p> <p>14 252 George Street</p> <p>15 Beckley, West Virginia 25801</p> <p>16 APPEARING FOR THE DEFENDANT, LOUISE E. GOLDSTON:</p> <p>17 Jennifer E. Tully, Esquire</p> <p>18 BAILEY & WYANT, PLLC</p> <p>19 500 Virginia Street East, Suite 600</p> <p>20 P.O. Box 3710</p> <p>21 Charleston, West Virginia 25337-3710</p> <p>22 APPEARING FOR THE SUPREME COURT OF APPEALS OF WEST</p> <p>23 VIRGINIA:</p> <p>24 Bradley Schmalzer, Esquire (via telephone)</p> <p>Julianne Wisman, Esquire (via telephone)</p> <p>ALSO PRESENT:</p> <p>Matthew Gibson, Plaintiff</p> <p>J.R. Morgan</p>	<p style="text-align: right;">Page 4</p> <p>1 PROCEEDINGS</p> <p>2 COURT REPORTER: This is the</p> <p>3 deposition of Brian White in the matter of Matthew</p> <p>4 Gibson versus Louise E. Goldston, et al., taking</p> <p>5 place at the offices of Pullin, Fowler, Flanagan,</p> <p>6 Brown, and Poe in Beckley, West Virginia on this</p> <p>7 1st day of March, 2022. The time is 2:00 p.m. We</p> <p>8 are now on the record.</p> <p>9 This case is venued in the United</p> <p>10 States District Court for the Southern District of</p> <p>11 West Virginia at Beckley, being Civil Action No.</p> <p>12 5:21-cv-00181.</p> <p>13 My name is Brad Cooper on behalf of</p> <p>14 Realtime Reporters, located at 713 Lee Street in</p> <p>15 Charleston, West Virginia. I am your court</p> <p>16 reporter and a Notary Public.</p> <p>17 At this time, would counsel please</p> <p>18 state their appearances and whom they represent and</p> <p>19 then I'll swear in the witness.</p> <p>20 MR. ROBINSON: Kevin Robinson on</p> <p>21 behalf of Defendants White, Stump, and McPeake.</p> <p>22 MS. TULLY: Jennifer Tully on behalf</p> <p>23 of Defendant Judge Louise Goldston.</p> <p>24 MR. BRYAN: John Bryan on behalf of</p>

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1 A lot of people were in there talking and I
 2 just kind of stood back, and I don't know who I
 3 talked to, whether it was Bobby or McPeake. I'm
 4 not sure.
 5 I probably was like, "What's going on?" You
 6 know, or, "Who's fighting?"
 7 Just trying to get an idea of what was going
 8 on.
 9 Q. You didn't observe anybody fighting or
 10 anything like that?
 11 A. No.
 12 Q. What were the people doing?
 13 A. They were just talking downstairs. There
 14 wasn't nobody, like, swinging punches.
 15 Q. Did you ask McPeake why he called for
 16 backup?
 17 A. No, I didn't. Not that I can recall. I
 18 mean, they called for backup and they hollered at
 19 us and tell us that they think they need backup, we
 20 go.
 21 Q. Did you recognize Judge Goldston?
 22 A. Yeah.
 23 Q. Did you -- were you wondering what she was
 24 doing inside Mr. Gibson's home?

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1 A. No. I didn't wonder. I mean, that wasn't
 2 -- wasn't my place. Like I said, I did some
 3 bailiff before the academy but I've worked -- I've
 4 been a road patrol deputy for all the time I been
 5 there.
 6 So as far as why they were there, I didn't
 7 have no idea.
 8 Q. At some point, did it become apparent to
 9 you that the judge was holding a Family Court
 10 proceeding inside Mr. Gibson's house?
 11 A. I didn't know if it was a court proceeding.
 12 I mean, I understood there were people in there
 13 were trying to figure out whose property was whose
 14 property. I mean, so, you see a judge there, a
 15 bailiff there, and then there's parties and they're
 16 talking about property, then I figured it was some
 17 sort of -- something to do with the Court.
 18 Q. Did the judge ever talk to you?
 19 A. Not that I can remember.
 20 Q. Okay. So what did you do next?
 21 A. I remember being there, and the next thing
 22 I can remember is going upstairs to the kitchen
 23 with a guy, and we was in the kitchen for a while
 24 and, shortly after that, Bobby told me,

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1 "Everything's good here. I got it."
 2 So I left and went to another call that was
 3 holding.
 4 Q. When you say you went upstairs in the
 5 kitchen with a guy, do you have any idea who the
 6 guy was?
 7 A. I guess it was the -- I guess it was
 8 Mr. Gibson.
 9 Q. Okay. Well, this is Mr. Gibson sitting
 10 next to me.
 11 A. Yeah. I don't -- I don't recognize him.
 12 Yeah. If he and his wife -- if I passed them on
 13 the street, I wouldn't even know what they looked
 14 like.
 15 Q. Okay. You were aware of the fact that you
 16 weren't at the Family Court.
 17 A. Was I aware I wasn't at Family Court?
 18 Q. Yeah.
 19 A. Obviously.
 20 Q. Yes. You were at somebody's house.
 21 A. Right.
 22 Q. Somebody's residence.
 23 A. I was.
 24 Q. Did it not seem unusual to you that you --

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1 you're observing what appears to be a Family Court
 2 proceeding inside somebody's private residence?
 3 A. It wasn't unusual to me. As far as I was
 4 aware, that -- I mean, that's something that they
 5 do. I mean, I didn't know.
 6 Q. Had you heard that, that that's something
 7 that happened in Raleigh County Family Court?
 8 A. I haven't. No.
 9 Q. Have you ever had any Family Court
 10 experience yourself, as a litigant?
 11 A. No.
 12 Q. Have you ever been in Family Court before,
 13 other than as a bailiff?
 14 A. No.
 15 Q. So how long do you think you were in the
 16 house total?
 17 A. I don't know. Five, ten minutes. That's
 18 the best that I can remember anyway.
 19 Q. And then McPeake told you that we don't
 20 need you here?
 21 A. No. It wasn't McPeake. It was Sergeant
 22 Stump. Bobby.
 23 Q. So --
 24 A. He -- I guess Mr. Gibson went upstairs. We